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February 22, 2016

Jake Lubera, Acting District Ranger
Wallowa Mountains
Wallowa-Whitman NF
US Forest Service
201 East 2nd Street
Joseph, OR 97846

Re: Lostine Corridor Public Safety Project

Dear Jake Lubera,

Thank you for the opportunity to provide comments on the upcoming Lostine Corridor Public Safety Project on behalf of Boise Cascade, LLC. Boise Cascade manufactures engineered wood products, plywood, lumber, and particleboard and distributes a broad line of building materials, including wood products manufactured by the company's wood products division. The company is privately owned and headquartered in Boise, ID, and operates mills that count on wood produced from the National Forests.

I am in general agreement with the purpose and need for this project and encourage the Forest Service to utilize the authorities provided under the most recent Farm Bill. These authorities include the use of a 3,000 acre categorical exclusion (CE) or the authority to use the expedited Healthy Forest Restoration Act. I encourage the Forest Service to utilize the 3,000 acre CE due to the expedited timeline and opportunity for collaboration. I recommend looking at the [Williams Creek Project](#) that was successfully completed on the Boise National Forest using the 3,000 CE.

- I suggest that the Forest Service be very aggressive in during the removal of vegetation in the corridor. This is a very popular recreational area and reducing the fire danger will alleviate some of the concern about infrastructure damage due to wildfire.
- I encourage the Forest Service to be particularly aggressive in managing vegetation around the campgrounds, guard station, and private property in the area. Please look at prescriptions that manage the area at the lower end of the stocking level to lengthen the return interval.
- I'm concerned about the RHCA's within the project area. These riparian habitat conservation areas many times function very similar to the adjacent upland forest. They also contain some of the highest fuel loads which could contribute to uncharacteristic

wildfire in this valuable recreational corridor. I suggest looking at removal of vegetation from these overstocked areas to mitigate fire impacts on these valuable areas.

- I also suggest that the Forest Service review the recent publication by Jain et al, "A Comprehensive Guide to Fuel Management Practices for Dry Mixed Conifer Forests in the Northwestern United States," published in October of 2012. This publication addresses the key issue of economic feasibility in fuel management.
- I suggest that the Forest Service use the "Restoration of Dry Forests in Eastern Oregon Field Guide" as a guide to restoring the project area. Use of this field guide will promote the natural structure within the area as well as provide commercially valuable commodities from the forest to better support the community.
- Please judiciously evaluate the use of prescribed fire in this area. I also suggest evaluating other means of fuels reduction (such as mastication). The Wallowa-Whitman NF has a very large backlog of prescribed fire on the forest and due to DEQ regulations for smoke management and I am concerned that the backlog will increase with future projects and reduce the priority for the Lostine Corridor.
- Please ensure that pulpwood removal is optional for the purchaser. This provision will ensure that all commercially viable fiber is used in the most cost effective manner.
- With the recent passage of the Farm Bill, the Forest Service has the authority to implement projects through designation by prescription. Please consider using the new tool to implement this project.
- Please look at the economic feasibility in relation to the material that is being removed. I suggest that the Forest Service take every opportunity to remove merchantable sawlogs in order to pay for this treatment. This could mean 1-2 more trees per acre. Please keep economics in mind when designing the treatments. I suggest evaluating removal of more than 3,500 mbf/acre to make the treatments feasible.

Thank you again for the opportunity to comment. I look forward to seeing outcomes of this project.

Regards,



Lindsay Warness
Forest Policy Analyst
Boise Cascade, LLC
1917 Jackson Ave.
La Grande, OR 97850

Additional Resources:

Graham, R., Harvey, A., Jain, T. and Tonn, J. (1999). Effects of thinning and similar stand treatments on fire behavior in western forests. USDA Forest Service, Pacific Northwest Research Station, General Technical Report PNW-GTR-463.

Jain, T., Battaglia, M., Han, H., Graham, R., Keys, C., Fried, J., Sandquist, J. (2012). A comprehensive guide to fuel management practices for dry mixed conifer forests in the northwestern United States. USDA Forest Service, Rocky Mountain Research Station, General Technical Report RMRS-GTR-292.

Franklin, J., Johnson, N., Churchill, D., Hagmann, K., Johnson, D., Johnston, J. (2013). Restoration of dry forests in Eastern Oregon. The Nature Conservancy.

